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Attorneys for Plaintiffs
RICHARD WADE and SAVANNAH CHAMPION

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

RICHARD WADE and SAVANNAH
CHAMPION,

Plaintiffs,

v.

CITY OF VACAVILLE, JOHN CARLI,
STEVEN GUNDERSON, RALPH
VALLIMONT, CHRIS LECHUGA, JEREMY
JOHNSON, WILLIAM BOEHM, TREVOR
CHAMPION, SABRINA CHAMPION,
JACKIE CHAMPION, and DOES 1 to 100,
inclusive,

Defendants.

Case No. 2:20-CV-01965-TLN-KJN

**STIPULATION AND ORDER TO EXTEND TIME
FOR PLAINTIFFS TO FILE AMENDED
COMPLAINT**

Hon. Troy L. Nunley

1 Plaintiffs RICHARD WADE and SAVANNAH CHAMPION and defendants CITY OF
2 VACAVILLE, JOHN CARLI, STEVEN GUNDERSON, RALPH VALLIMONT, CHRIS LECHUGA,
3 JEREMY JOHNSON and WILLIAM BOEHM, by and through their counsel of record, hereby represent
4 to the Court as follows:

5 WHEREAS, on September 30, 2020 Plaintiffs filed their complaint in the above captioned action;

6 WHEREAS, on December 14, 2020, defendant CITY OF VACAVILLE was served with the
7 complaint;

8 WHEREAS, defendant CITY OF VACAVILLE's responsive pleading was originally due on
9 January 4, 2021;

10 WHEREAS, counsel for the parties met and conferred to discuss the claims being brought and
11 whether an amended complaint should be filed to avoid unnecessary motion practice;

12 WHEREAS on December 30, 2020, the parties stipulated to continue defendant CITY OF
13 VACAVILLE's responsive pleading deadline by 15 days to January 19, 2021;

14 WHEREAS on December 30, 2020, the parties also stipulated that any other CITY OF
15 VACAVILLE employees who are defendants in this case and for whom service has been accomplished
16 prior to January 19, 2021, either by personal service or by service being accepted by counsel for the
17 CITY OF VACAVILLE, shall also file any responsive pleading by January 19, 2021;

18 WHEREAS, on January 3, 2021, plaintiffs' counsel suffered a stroke and, as a result, his health
19 and speech has been impacted;

20 WHEREAS, counsel for the parties further met and conferred and stipulated to continue the time
21 for plaintiffs to file an amended complaint to February 5, 2021;

22 WHEREAS, defendants' responsive pleading will be due within 21 days of the date the amended
23 complaint is filed.

24 IT IS HEREBY STIPULATED, pursuant to Local Rule 144(a), that plaintiffs will file an
25 amended complaint on or before February 5, 2021 and defendants' deadline to respond to the amended
26 complaint shall be within 21 days of the date the amended complaint is filed.

27 It is so stipulated and agreed.

28 //

1 Dated: January 11, 2021

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

2
3 By: /s/ Richard W. Osman

4 Richard W. Osman

5 Sheila D. Crawford

6 Attorneys for Defendants

CITY OF VACAVILLE, JOHN CARLI, STEVEN

GUNDERSON, RALPH VALLIMONT, CHRIS

LECHUGA, JEREMY JOHNSON, and WILLIAM

BOEHM

8 Dated: January 11, 2021

LAW OFFICE OF FRANK PACHECO

9
10 By: /s/ Frank M. Pacheco

11 Frank M. Pacheco

Attorneys for Plaintiffs

RICHARD WADE and SAVANNAH CHAMPION

12
13 **ATTORNEY ATTESTATION**

14 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
15 conformed signature (“/s/”) within this E-filed document or have been authorized by Plaintiffs’ counsel
16 to show their signature on this document as /s/.

17 Dated: January 11, 2021

18 By: /s/ Richard Osman

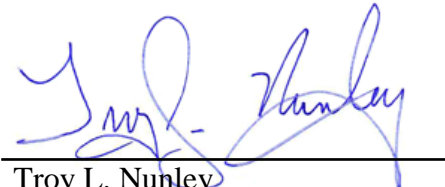
19 Richard W. Osman

20
21 **ORDER**

22 GOOD CAUSE APPEARING THEREFORE, and the parties’ having stipulated to the same, the
23 parties’ stipulation is hereby APPROVED.

24 **IT IS SO ORDERED.**

25 DATED: January 11, 2021

26 
Troy L. Nunley

United States District Judge